

General Complaint

FILED-CLERK  
U.S. DISTRICT COURT  
2017 OCT -4 PM 4:07

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS

Chelsea Connor  
Plaintiff

Case Number : \_\_\_\_\_

List the full name of each plaintiff in this action.

VS.

Warfab Oilfield Services  
Defendant

List the full name of each defendant in this action.  
Do not use "et al".

Attach additional pages if necessary.

I. ATTEMPT TO SECURE COUNSEL:

Please answer the following concerning your attempt to secure counsel.

A. In the preparation of this suit, I have attempted to secure the aid of an attorney as follows: (circle one)

- ① Employ Counsel
2. Court - Appointed Counsel
3. Lawyer Referral Service of the State Bar of Texas,  
P. O. Box 12487, Austin, Texas 78711.

B. List the name(s) and address(es) of the attorney(s):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

C. Results of the conference with counsel:

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II. List previous lawsuits:

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action or any other incidents? ✓ Yes ~~✓~~ No

B. If your answer to "A" is "yes", describe the lawsuit in the space below. If there is more than one lawsuit, attach a separate piece of paper describing each.

1. Approximate file date of lawsuit: 2011

2. Parties to previous lawsuit(s):

Plaintiff Chelsea Connor

Defendant Avril International

Attach a separate piece of paper for additional plaintiffs or defendants.

3. Identify the court the lawsuit was filed. If federal, name the district. If state, name the county.

HERE

4. Docket number in other court. 1100178

5. Name of judge to whom the case was assigned.

\_\_\_\_\_

6. Disposition: Was the case dismissed, appealed or still pending?

Settlement

7. Approximate date of disposition. \_\_\_\_\_

III. Parties to this suit:

A. List the full name and address of each plaintiff:

Pla #1 CHELSEA Connor  
207 E. Sycamore Lane Unit B  
Longview Tx 75604

Pla #2 \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

B. List the full name of each defendant, their official position, place of employment and full mailing address.

Dft #1: Warfab Oilfield Services  
Registered Agent Mitch Motley  
1127 Judson Rd Suite 211 Longview Tx 75601

Dft #2: Monica Cole - HR  
\_\_\_\_\_  
\_\_\_\_\_

Dft #3 \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Attach a separate sheet for additional parties.

## IV: Statement of Claim:

State as briefly as possible the fact of your case. Describe how each defendant is involved. Include the names of other persons involved with dates and places. Do not give any legal arguments or cite cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need, attaching additional pages if necessary.

Warfab Oilfield Service Management  
 those staff & employ on 11/09/16 -  
 11/16/16 while Plaintiff was employed  
 & wrongfully terminated was constantly  
 monitored, treated unfairly, singled out,  
 discriminated against under ~~FOIA~~ Title VII.  
 ON 11/07/16 Plaintiff went to training  
 At Hallsville office (Warfab) after training  
 Monica Cole did not provide plaintiff  
 with handbook, job description of  
 what my position was. Plaintiff first day  
 11/09/16 was placed on drill machine  
 where I was qualified / never operated  
 before. Plaintiff was trained approximately  
 3 to 4 hours and Roy supervisor moved  
 Alan (trainer). I wasn't properly trained  
 I had to constantly go get Richard to  
 help me. This was a conspiracy so I wouldn't  
 succeed to have a reason to fire me for low  
 production. Staff & employees constantly  
 harassing me, going in office switching on me,  
 going to go get management / staff come catch me  
 or need yes to them to.

- V. Relief: State Briefly exactly what you want the court to do for you. Make no legal arguments and do not cite cases or statutes. Attach additional pages if necessary.

Your Honor - Motion to Proceed  
Motion To Serve DEFENDANTS  
Registered Agent Mitch Mohr  
1127 Judson Rd Suite 211 Longview TX 75601

Signed this 4th day of October, 20 17  
(Month) (Year)

I declare (certify, verify or state) under penalty of perjury that the foregoing is true and correct.

Executed on: \_\_\_\_\_  
Date

Chelsea Cannon  
Signature of each plaintiff

CIVIL CASE

COVER SHEET

CHELSEA CONNOR

PLAINTIFF

207 E. SYCAMORE LANE UNIT B  
LONGVIEW, TEXAS 75604  
903-631-9090

VS

WARFAB OILFIELD SERVICES  
REGISTERED AGENT  
MITCH MOTLEY  
1127 JUDSON ROAD SUITE 211  
LONGVIEW, TEXAS 75601  
DEFENDANT

IN THE U.S. DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS

TO THE HONORABLE JUDGE OF SAID COURT:

TYPE OF ACTIONS

CONSPIRACY WRONGFUL TERMINATION

WORKPLACE CONSPIRACY

PATTERN OF ORGANIZATION

WORKPLACE TORT

CREATED HOSTILE WORK ENVIRONMENT

FAILED TO PROVIDE A SAFE WORK ENVIRONMENT

FAILED TO PROVIDE PLAINTIFF TRAINING TO SUCCEED

DISCRIMINATED AGAINST FOR AGE, RACE, COLOR, AND SEX

NO \_\_\_\_\_

CHELSEA CONNOR

VS

WARFAB OILFIELD SERVICES

PLAINTIFF ORIGINAL PETITION  
AND REQUEST FOR RULE 194 DISCLOSURE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, CHELSEA CONNOR, PLAINTIFF HEREIN,  
COMPLAINING OF WARFAB OILFIELD SERVICES, UNDER DISC-  
OVERY LEVEL III, AND WOULD RESPECTFULLY SHOW THE COURT  
AS FOLLOWS:

1.0 PLAINTIFF IS A CITIZEN AND RESIDENT OF LONGVIEW,  
HARRISON GREGG COUNTY TEXAS.

2.0 DEFENDANT WARFAB OILFIELD SERVICES IS A TEXAS  
CORPORATION WHICH RESIDES IN LONGVIEW HALLSVILLE  
TEXAS WHICH HAS QUALIFIED AND DOES CONDUCTS ITS  
BUSINESS IN TEXAS, AND MAY BE SERVED PROCESS BY  
SERVING ITS REGISTERED AGENT FOR SERVICE MITCH MOTLEY  
1127 JUDSON ROAD SUITE 211 LONGVIEW, TEXAS 75601.

OCTOBER 04, 2017

MRS. SHERRY GRIFFIS  
DISTRICT CLERK OF HARRISON COUNTY  
200 WEST HOUSTON STREET. SUITE 234  
MARSHALL, TEXAS 75670

RE: CHELSEA CONNOR VS WARFAB OILFIELD SERVICES  
CAUSE NO \_\_\_\_\_ (NEW CASE)

DEAR MRS. GRIFFIS

ENCLOSED IS THE ORIGINAL AND TWO COPIES OF THE  
PLAINTIFF'S ORIGINAL PETITION ALONG WITH MY PAYMENT  
OF \$400.00 FOR FILING FEE, JURY FEE, AND ISSUANCE OF  
ONE CITATION FOR PERSONAL SERVICE.

PLEASE ISSUE THE CITATION AS FOLLOWS:

1. DEFENDANT, WARFAB OILFIELD SERVICES, MAY BE  
SERVED PROCESS BY SERVING ITS REGISTERED AGENT FOR  
SERVICE, MITCH MOTLEY 1127 JUDSON ROAD SUITE 211  
LONGVIEW, TEXAS 76501.

CHELSEA CONNOR  
207 E. SYCAMORE  
LANE UNIT B  
LONGVIEW, TX  
75604



3.0 THE COURT HAS JURISDICTION IN THE AMOUNT IN CONTROVERSY IS IN EXCESS OF JURISDICTIONAL MINIMUM LIMIT FOR THIS COURT. THERE IS EXCLUSIVE JURISDICTION AS TO THE CLAIM BROUGHT ONTO THE TEXAS COMMISSION ON HUMAN RIGHTS ACT, AND CONCURRENT JURISDICTION WITH THE FEDERAL COURTS IN REGARDS TO THE TITLE VII CLAIMS. THE COURT HAD PERMISSIVE VENUE OVER SUCH CONTROVERSY IN THAT ALL OR A SUBSTANTIAL PORTION OF THE ACTS AND OMISSIONS WHICH ARE SUBJECT AND OR BASIS FOR THE SUIT OCCURRED IN GREGG COUNTY, TEXAS.

CONDITIONS PRECEDENT;

4.0 THE PLAINTIFF HAS TIMELY INITIATED COMPLAINTS AGAINST THE EMPLOYER WITH THE TEXAS WORKFORCE COMMISSION CIVIL RIGHTS DIVISION FOR RETALIATORY VIOLATIONS OF THE TEXAS COMMISSION ON HUMAN RIGHTS ACT (TEXAS LABOR CODE 21.05 I et SEQ) and TITLE VII VIOLATIONS SUCH ACTIONS ARE RIGHT FOR SUIT AS A RIGHT TO SUE LETTER HAS BEEN ISSUED RELEASING THE PLAINTIFF FROM ADMINISTRATIVE REVIEW IN REGARDS TO SUCH CLAIMS.

DISCRIMINATION UNDER TITLE VII OR TCHRA:

5.0 PLAINTIFF IS AN EMPLOYEE WITHIN THE MEANING OF TITLE VII AND TCHRA IN THAT PLAINTIFF BELONGS TO A CLASS PROTECTED UNDER THE STATUE, A BLACK FEMALE.

6.0 DEFENDANT IS AN EMPLOYER WITHIN THE MEANING OF TITLE VII AND OR EQUIVALENT STATE STATUES.

7.0 DEFENDANT IS INTENTIONALLY DISCRIMINATING AGAINST PLAINTIFF BECAUSE OF HER RACE IN VIOLATION OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964.

8.0 DEFENDANT INTENTIONALLY DISCRIMINATED AGAINST PLAINTIFF BECAUSE OF AGE 40 or OLDER IN VIOLATION OF THE AGE DISCRIMINATION IN EMPLOYMENT ACT OF 1967 (ADEA

9.0 PLEADING FURTHER IN THE ALTERNATIVE, IN THE EVENT THAT, AND TO THE EXTENT THAT THE DEFENDANT ALLEGES ANY RACE NEUTRAL BASIS FOR SUCH ADVERSE EMPLOYMENT ACTION, SUCH AS RACE NEUTRAL BASIS CONSTITUTE A PRETEXT FOR THE COMMISSION OF INTENTIONAL DISCRIMINATION.

10.0 PLEADING FURTHER IN THE ALTERNATIVE, IN THE EVENT THAT, AND TO THE EXTENT THAT THE DEFENDANT ALLEGES ANY GENDER NEUTRAL BASIS FOR SUCH ADVERSE EMPLOYMENT ACTION, SUCH AS GENDER NEUTRAL BASIS CONSTITUTE A PRETEXT FOR THE COMMISSION OF THE INTENTIONAL DISCRIMINATION.

11.0 PLEADING FURTHER IN THE ALTERNATIVE, THE DEFENDANT INTENTIONALLY DISCRIMINATED AGAINST THE PLAINTIFF BY THE CREATION OF AND OR ALLOWANCE OF A HOSTILE WORK ENVIRONMENT BY ITS FAILURE TO PROVIDE A SAFE WORK ENVIRONMENT. THE DEFENDANT FAILURE TO SEE OTHER EMPLOYEES FOR NOT MEETING PRODUCTION QUOTAS LATE AND TARDY BACK FROM BREAKS. DEFENDANT MONITORED THE PLAINTIFF CONSTANTLY, TREATED UNFAIRLY, SINGLED OUT AND THEN WRONGFULLY TERMINATED.

12.0 PLEADING FURTHER DEFENDANT INTENTIONALLY DISCRIMINATED AGAINST THE PLAINTIFF BY NOT GIVING THE PLAINTIFF THE APPROPRIATE TRAINING, TOOLS, AND SUPPORT NEEDED IN ORDER TO ACHIEVE THE GOAL. DEFENDANT NEVER GAVE THE PLAINTIFF A HANDBOOK. DEFENDANT PRIOR TO THE PLAINTIFF TO START THE NEW POSITION NEVER TOLD THE PLAINTIFF HER JOB TITLE. PLAINTIFF NEVER IN HER CAREER BEEN A MACHINIST. THIS ACT WAS A INTENTIONAL ACT BY ACT BY THE DEFENDANT TO CONSPIRE TOGETHER WITH STAFF EMPLOYEES TO TERMINATE PLAINTIFF POSITION AND DENY PLAINTIFF UNEMPLOYMENT BENEFITS. DEFENDANT WAS AWARE THAT THE PLAINTIFF WAS RECEIVING UNEMPLOYMENT PRIOR TO OFFERING PLAINTIFF A POSITION. THIS WAS A WORKPLACE CONSPIRACY PLANNED BY THE DEFENDANT FROM DAY ONE AGAINST PLAINTIFF.

13.0 PLEADING FURTHER THE ALTERNATIVE THE DEFENDANT INTENTIONAL TERMINATION OF THE PLAINTIFF WAS MERELY PRETEXT AND FALSE ABOUT THE PLAINTIFF IN THE BATHROOM FOR 45 minutes WAS ANOTHER WITCHHUNT.

14.0 DEFENDANT INTENTIONALLY DISCRIMINATED AGAINST THE PLAINTIFF BY NOT TAKING THE NECESSARY STEPS NEEDED TO DISCIPLINE PLAINTIFF OF WHAT WAS EXPECTED IN ORDER TO ACCOMPLISH THE GOAL. DEFENDANT NEVER VERBALLY OR IN WRITING WARN THE PLAINTIFF ABOUT NOT MEETING THE GOAL. DEFENDANT ACTED WITH MALICE BY TERMINATING PLAINTIFF

15.0 PLEADING FURTHER THE DEFENDANT ALLOWED AND HAD FLOOR STAFF AND EMPLOYEES TO HARRASS PLAINTIFF WHILE TRYING TO PERFORM HER WORK DUTIES. DEFENDANT INTENTIONALLY CREATED A HOSTILE WORK ENVIRONMENT AGAINST HER.

THE LAW AMENDS TITLE VII AND THE ADA TO PERMIT JURY TRIALS AND COMPENSATORY AND PUNITIVE DAMAGE AWARDS IN INTENTIONAL DISCRIMINATION CASES.

SINCERELY,  
CHELSEA CONNOR  
207 E. SYCAMORE  
LANE UNIT B  
LONGVIEW, TEXAS  
75604